

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

)
)
UNITED STATES OF AMERICA,)
)
Plaintiff,) CASE NO.: 1:21-cv-00564
)
vs.) JUDGE CHRISTOPHER A. BOYKO
)
)
REAL PROPERTY LOCATED AT)
100 MOUNTAIN VIEW DRIVE,)
MORELAND HILLS, OHIO)
CUYAHOGA COUNTY PERMANENT)
PARCEL NOS: 913-06-001,)
913-06-005, et al.,)
)
Defendants.)
)

RESPONSE TO UNITED STATES' MOTION FOR A STAY

Eyton Senders, 100 Mountain View LLC, Corner Green LLC, ES Global Real Estate Holdings LLC, and N. Laurel Avenue Property Holdings LLC (collectively “Claimants”) hereby respond that Claimants do not oppose the United States’ Motion For A Stay. Furthermore, Claimants join in respectfully requesting a stay of this civil forfeiture case at this time, but for the reasons stated previously in their Motion for a Protective Order.

A “court may decide in its discretion to stay civil proceedings, postpone civil discovery, or impose protective orders and conditions ‘when the interests of justice ...seem to require such action, sometimes at the request of the

prosecution,...sometimes at the request of the defense.” *Securities and Exch.*
Comm’n v. Dresser Indus., Inc., 628 F. 2d 1368, 1375 (D.C. Cir. 1980) (en banc)
(quoting *United States v. Kordel*, 397 U.S. 1, 12 n.27 (1970)).

Date: May 25, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of May, 2021, the undersigned served this Response to United States' Motion For A Stay via this Court's CM/ECF system, which will serve a copy on all counsel of record.

EWS

Edmund W. Searby
Counsel for Claimants